

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Criminal No. 7:19-cr-00522
	§	
DANIEL GARCIA	§	

MOTION TO INCORPORATE AND
ADOPT MOTIONS OF CODEFENDANTS

The Defendant, Daniel Garcia, moves this Honorable Court, pursuant to Federal Rule of Criminal Procedure 12, for permission to incorporate and adopt each and every motion filed by the co-defendants. This motion is intended to include all motions filed during the course of the prosecution of this cause that, by their facts, are not particular to the defendant who filed them. The Defendant reserves the right to object to any motion not intended to be adopted or incorporated by this motion.

WHEREFORE, the defendant prays this Honorable Court will adopt this motion and make it a part of the record.

Respectfully submitted,

By /s/ Clay S. Conrad
Clay S. Conrad
Texas Bar No. 12555900
LOONEY, SMITH & CONRAD, P.C.
11767 Katy Freeway, Ste. 740
Houston, TX 77079
Telephone: 281-597-8818
Fax: 281-597-8284

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was electronically delivered to the Assistant United States Attorney responsible for litigation of this case on March 17, 2020.

By: /s/ Clay S. Conrad
Clay S. Conrad

CERTIFICATE OF CONFERENCE

I, the undersigned, hereby certify that on March 17, 2020, I attempted to confer with Roberto Lopez, the Assistant U.S. Attorney responsible for litigation of this cause, and he was opposed to the relief requested.

By: /s/ Clay S. Conrad
Clay S. Conrad

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Criminal No. 7:19-cr-00522
	§	
DANIEL GARCIA	§	

ORDER

The defendant Daniel Garcia's motion to incorporate and adopt motions of Codefendants is GRANTED.

SIGNED at Houston, Texas, this the ____ day of _____, 2020.

UNITED STATES DISTRICT JUDGE